

ORIGINAL

IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

MAY 14 2013

JAMES N. HATTEN, Clerk

By: pmw Deputy Clerk

UNITED STATES OF AMERICA

v.

FIRST SUPERSEDING INDICTMENT
NO. 1:13-CR-128
UNDER SEAL

ARTURO ROJAS-COYOTL,

a/k/a "Taco," a/k/a "Jonathan,"

ODILON MARTINEZ-ROJAS, a/k/a "Chino,"

a/k/a "Saul"

SEVERIANO MARTINEZ-ROJAS,

a/k/a "Negro," a/k/a "Gato,"

DANIEL GARCIA-TEPAL, a/k/a "Boxeador,"

a/k/a "David"

THE GRAND JURY CHARGES THAT:

COUNT ONE – SEX TRAFFICKING

1. Beginning in or about February 2006 and continuing through in or about November 2007, in the Northern District of Georgia and elsewhere, the defendants,

ARTURO ROJAS-COYOTL, a/k/a "Taco," a/k/a "Jonathan,"
ODILON MARTINEZ-ROJAS, a/k/a "Chino," a/k/a "Saul," and
SEVERIANO MARTINEZ-ROJAS, a/k/a "Negro," a/k/a "Gato"

aided and abetted by each other, did knowingly recruit, entice, harbor, transport, provide, and obtain by any means a person, "FBF," and did benefit financially and by receiving a thing of value from participation in a venture which engaged in such acts, in and affecting interstate and foreign commerce, knowing that force, fraud, and coercion would be used to cause "FBF" to engage in commercial sex acts, all in violation of Title 18, United States Code, Sections 1591(a) and (b)(1), and Section 2.

COUNT TWO – ENCOURAGING AND INDUCING ILLEGAL ENTRY

2. Beginning in or about February 2006 and continuing through in or about November 2007, in the Northern District of Georgia and elsewhere, the defendants,

ARTURO ROJAS-COYOTL, a/k/a “Taco,” a/k/a “Jonathan,”
ODILON MARTINEZ-ROJAS, a/k/a “Chino,” a/k/a “Saul,” and
SEVERIANO MARTINEZ-ROJAS, a/k/a “Negro,” a/k/a “Gato”

while aiding and abetting one another, encouraged and induced an alien, “FBF,” to come to, enter, and reside in the United States, for the purpose of commercial advantage and private financial gain, knowing and in reckless disregard of the fact that such coming to, entry, and residence was and would be in violation of the law, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iv), (v)(II), and (a)(1)(B)(i).

COUNT THREE – SEX TRAFFICKING

3. Beginning in or about March 2007 and continuing through in or about March 2008, in the Northern District of Georgia and elsewhere, the defendants,

ARTURO ROJAS-COYOTL, a/k/a “Taco,” a/k/a “Jonathan,”
ODILON MARTINEZ-ROJAS, a/k/a “Chino,” a/k/a “Saul,” and
SEVERIANO MARTINEZ-ROJAS, a/k/a “Negro,” a/k/a “Gato”

aided and abetted by each other, did knowingly recruit, entice, harbor, transport, provide, and obtain by any means a person, “MSJ,” and did benefit financially and by receiving a thing of value from participation in a venture which engaged in such acts, in and affecting interstate and foreign commerce, knowing that force, fraud, and coercion would be used to cause “MSJ” to engage in commercial sex acts, all in violation of Title 18, United States Code, Sections 1591(a) and (b)(1), and Section 2.

COUNT FOUR – ENCOURAGING AND INDUCING ILLEGAL ENTRY

4. Beginning in or about March 2007 and continuing through in or about April 2008, in the Northern District of Georgia and elsewhere, the defendants,

ARTURO ROJAS-COYOTL, a/k/a “Taco,” a/k/a “Jonathan,” and
ODILON MARTINEZ-ROJAS, a/k/a “Chino,” a/k/a “Saul,” and
SEVERIANO MARTINEZ-ROJAS, a/k/a “Negro,” a/k/a “Gato”

while aiding and abetting one another, encouraged and induced an alien, “MSJ,” to come to, enter, and reside in the United States, for the purpose of commercial advantage and private financial gain, knowing and in reckless disregard of the fact that such coming to, entry, and residence was and would be in violation of the law, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iv), (v)(II), and (a)(1)(B)(i).

COUNT FIVE – SEX TRAFFICKING

5. Beginning in or about March 2007 and continuing through in or about May 2008, in the Northern District of Georgia and elsewhere, the defendants,

ODILON MARTINEZ-ROJAS, a/k/a “Chino,” a/k/a “Saul,”
ARTURO ROJAS-COYOTL, a/k/a “Taco,” a/k/a “Jonathan,” and
SEVERIANO MARTINEZ-ROJAS, a/k/a “Negro,” a/k/a “Gato”

aided and abetted by each other, did knowingly recruit, entice, harbor, transport, provide, and obtain by any means a person, “SAM,” and did benefit financially and by receiving a thing of value from participation in a venture which engaged in such acts, in and affecting interstate and foreign commerce, knowing that force, fraud, and coercion would be used to cause “SAM” to engage in commercial sex acts, all in violation of Title 18, United States Code, Sections 1591(a) and (b)(1), and Section 2.

COUNT SIX – ENCOURAGING AND INDUCING ILLEGAL ENTRY

6. Beginning in or about March 2007 and continuing through in or about May 2008, in the Northern District of Georgia and elsewhere, the defendants,

ODILON MARTINEZ-ROJAS, a/k/a “Chino,” a/k/a “Saul,”
ARTURO ROJAS-COYOTL, a/k/a “Taco,” a/k/a “Jonathan,” and
SEVERIANO MARTINEZ-ROJAS, a/k/a “Negro,” a/k/a “Gato”

while aiding and abetting one another, encouraged and induced an alien, “SAM,” to come to, enter, and reside in the United States, for the purpose of commercial advantage and private financial gain, knowing and in reckless disregard of the fact that such coming to, entry, and residence was and would be in violation of the law, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iv), (v)(II), and (a)(1)(B)(i).

COUNT SEVEN – ENCOURAGING AND INDUCING ILLEGAL ENTRY

7. Beginning in or about February 2010 and continuing through in or about May 2013, in the Northern District of Georgia and elsewhere, the defendants,

DANIEL GARCIA-TEPAL, a/k/a “Boxeador,” a/k/a “Daniel,” and
ARTURO ROJAS-COYOTL, a/k/a “Taco,” a/k/a “Jonathan,”

while aiding and abetting one another, encouraged and induced an alien, “MRM,” to come to, enter, and reside in the United States, for the purpose of commercial advantage and private financial gain, knowing and in reckless disregard of the fact that such coming to, entry, and

residence was and would be in violation of the law, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iv), (v)(II), and (a)(1)(B)(i).

A True BILL
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